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PRACTICE IN THE AREA OF EMPLOYMENT AND LABOR LAW

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VIA ECF

Honorable Brian M. Cogan
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

April 3, 2020

Re: Pacheco, et al. v. Presco Industries Inc., et al.
Case No.: 19-cv-5485

Dear Judge Cogan:

We write to request a 60 day stay on the above matter so that Defendants can find and transition to new defense counsel. Tragically, Defendants' attorney of record in this matter recently passed away due to the pandemic. Defendants will need this time given the current situation to find and retain new counsel and have new counsel get up to speed and meet with Plaintiffs' counsel to present a proposed revised discovery plan moving forward.

This request is made upon consent of all parties.

Very truly yours,

/s/
David A. Robins